

1 KAEMPFER CROWELL  
2 Robert McCoy, No. 9121  
3 Sihomara L. Graves, No. 13239  
4 1980 Festival Plaza Drive, Suite 650  
5 Las Vegas, Nevada 89135  
Telephone: (702) 792-7000  
Facsimile: (702) 796-7181  
Email: [rmccoy@kcnvlaw.com](mailto:rmccoy@kcnvlaw.com)  
Email: [sgraves@kcnvlaw.com](mailto:sgraves@kcnvlaw.com)

6 Attorneys for Defendant American Express  
Company

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

10 DEBORAH R. CINTRON, M.D.,  
individually,

| Case No. 2:21-CV-00647 -RFB-VCF

Plaintiff,

VS.

13 AMERICAN EXPRESS COMPANY, a  
14 New York Corporation, and DOES 1-10  
inclusive.

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND**

**(FIRST REQUEST)**

### Defendants.

18 Plaintiff Deborah R. Cintron, M.D. (“Dr. Cintron”) and defendant  
19 American Express Company (“Amex”) stipulate that the deadline for Amex to  
20 respond to the complaint (ECF No. 1) be extended from July 2, 2021 until July 23,  
21 2021. This is the first extension sought in connection with this deadline.

1           This extension is requested to permit the recently hired counsel for  
2 Amex sufficient time to investigate the allegations in the complaint and to discuss  
3 the possibility of settlement with Dr. Cintron.

4 IRELAND LAW GROUP, LLC

5           \_\_\_\_\_  
6 /s/ *Amanda L. Ireland*  
7 Amanda L. Ireland, No. 13155  
8 7854 West Sahara Avenue  
9 Las Vegas, Nevada 89117

10          Attorney for Plaintiff Deborah R.  
11 Cintron, M.D.

KAEMPFER CROWELL

\_\_\_\_\_  
*Sih Graves*  
Robert McCoy, No. 9121  
Sihomara L. Graves, No. 13239  
1980 Festival Plaza Drive, Suite 650  
Las Vegas, Nevada 89135

Attorneys for Defendant American  
Express Company

10           **ORDER**

11           IT IS SO ORDERED.

12           \_\_\_\_\_  
*Cam Ferenbach*

13           \_\_\_\_\_  
14 Cam Ferenbach  
15 United States Magistrate Judge

16           7-2-2021

17           Dated: \_\_\_\_\_